Housing Impact Statement

Bronte Creek Meadows, City of Burlington

March 6, 2026

KPEC
Planning + Economics

Housing Impact Statement

Bronte Creek Meadows, City of Burlington

Prepared for:

Alinea Development Corporation

Keleher Planning & Economic Consulting Inc.

75 Main Street East, Milton ON, L9T 1N4

March 6, 2026

EXECUTIVE SUMMARY

Keleher Planning & Economic Consulting Inc. was retained by Alinea Development Corporation (“Landowners”) to review matters related to the provision of housing in the City of Burlington that may arise from the proposed development of Phase 1 of the Bronte Creek Meadows development.

The subject site is located in the City of Burlington southwest of Upper Middle Road and Burloak Drive and are located immediately west of Bronte Creek Provincial Park.

The Phase 1 lands are located on the western portion of the subject site and would include a mix of uses ranging from residential uses in various typologies from singles, townhome, and within both mid-rise and high-rise mixed-use blocks, as well as a range of non-residential lands for employment uses. The development would also include lands for parks and open space.

The subject site is proposed to be developed with a total of 770 residential units, including a mix of single-detached, townhouse, stacked townhouse, back-to-back townhouse and apartment units, which based on average household sizes estimated in the City’s 2024 DC Study, would generate a population of 1,667 persons.

The 2024 PPS requires municipalities to provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents. While the City’s MTSAs are planned to accommodate a substantial amount housing and population growth, a study prepared for the City found that these MTSAs would achieve only 43% of the City’s projected growth to 2051 even if they all able to achieve minimum densities within the 2051 horizon (which range from 120 to 200 persons and jobs per hectare).

The City’s development pipeline contains over 44,100 dwelling units, however, only 16% of these dwelling units have full approvals, while the other 37,000 units are awaiting additional approvals, decisions, or submission of an application. Under an assumption that all fully approved units are built, all of the units with applications and/or partial approvals are approved and built as proposed, the City would still need 33% of the sites without an application to submit applications, be approved and be permitted by 2032 to achieve the City’s housing targets of 29,000 new units by 2032.

The more robust the City’s development approvals pipeline is, the lower the percentage of 'pipeline’ units need to clear numerous hurdles in the remaining planning, legal, design, and marketing processes.

To achieve the Provincial housing targets, or the Regional Phasing from Table 2A of the Regional Official Plan, the City will need housing production to accelerate over historic levels - over the past 10 years (2015-2024), the City has seen an average of 534 units completed per year, and the 10-year averages have fallen in each successive period from 914 units per year over the 2005-2014 period and from 1,268 units per year in the 1995-2004 period. The City has not exceeded 1,000 housing completions in a single year since 2010.

As the City has built-out, the amount of ground-related housing added to the City's housing mix ha declined substantially – ground-related housing production in the 10-year period 2015-2024 (160 units per year) was 85% lower than it was in the 1995-2004 period (1,045 units/year).

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1. INTRODUCTION

Keleher Planning & Economic Consulting Inc. was retained by Alinea Development Corporation ("Landowners") to review matters related to the provision of housing in the City of Burlington that may arise from the proposed development of Phase 1 of the Bronte Creek Meadows development.

1.1. Overview of Subject Site

The subject site is located in the City of Burlington southwest of Upper Middle Road and Burloak Drive, and are located immediately west of Bronte Creek Provincial Park. The lands are also adjacent to Corpus Christi Catholic Secondary School. To the north, across Upper Middle Road and to the immediate west are existing residential areas, and to the south opposite of Mainway is an existing employment area.

Figure 1

Location of Subject Site, Bronte Creek Meadows

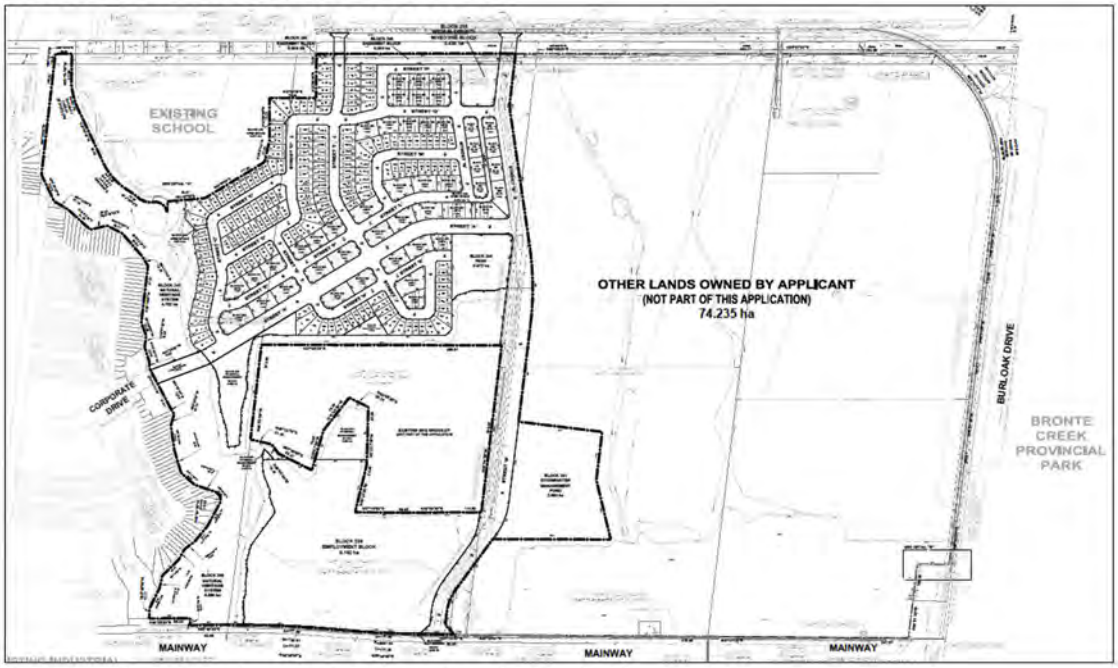


Source: Google Maps

The Phase 1 lands are located on the western portion of the subject site and would include a mix of uses ranging from residential uses in various typologies from singles, townhome, and within both mid-rise and high-rise mixed-use blocks, as well as a range of non-residential lands for employment uses. The development would also include lands for parks and open space.

Figure 2

Draft Plan of Proposed Subdivision (Phase 1), Bronte Creek Meadows



Source: Alinea Development Corporation & Bousfields

The subject site is proposed to be developed through Phase 1 with a total of 700 residential units, including a mix of single-detached, townhouse, back-to-back townhouse and apartment units, which based on average household sizes estimated in the City's 2024 DC Study, would generate a population of 1,667 persons.

Figure 3

Unit Mix and Estimated Population, Bronte Creek Meadows Phase 1

Unit Type	Units	Persons per Unit	Estimated Population
12.5-metre single-detached	83	3.38	280
11.0-metre single-detached	108	3.38	365
6.1-metre on-street townhouses	120	2.43	292
6.1-metre rear lane townhouses	45	2.43	109
7.0-metre double frontage townhouses	84	2.43	204
Mixed-Use Blocks - apartments	260		
1-bedroom apartments	*117*	1.36	159
2-bedroom apartments	*91*	1.80	164
3-bedroom apartments	*52*	1.80	94
Total	700		1,667

Source: KPEC based on plans provided by client, and City of Burlington 2024 DC Study

2. POLICY ANALYSIS

2.1. Planning Act

Sections 16(4) and 16(5) of the *Planning Act* authorizes municipalities to use inclusionary zoning, where municipalities not prescribed in regulation (such as the City of Burlington), are enabled to have policies requiring affordable housing in a Protected Major Transit Station Area (PMTSA) or in an area where a development permit system is adopted.

> ***Inclusionary zoning policies***
>
> *(4) An official plan of a municipality that is prescribed for the purpose of this subsection shall contain policies that authorize inclusionary zoning by,*
>
> *(a) authorizing the inclusion of affordable housing units within buildings or projects containing other residential units; and*
>
> *(b) providing for the affordable housing units to be maintained as affordable housing units over time. 2016, c. 25, Sched. 4, s. 1 (2).*
>
> ***Same***
>
> *(5) An official plan of a municipality that is not prescribed for the purpose of subsection (4) may contain the policies described in subsection (4) in respect of,*
>
> *(a) a protected major transit station area identified in accordance with subsection (15) or (16), as the case may be; or*
>
> *(b) an area in respect of which a development permit system is adopted or established in response to an order under subsection 70.2.2 (1). 2019, c. 9, Sched. 12, s. 2 (2).*

A recently filed regulation (O.Reg. 54/25) would set the maximum percentage of affordable housing that can be required at 5% of the total residential units that are part of the development, and for a maximum period of time of 25 years. Inclusionary Zoning will become in-effect with the Minister recently approving the PMTSAs.

However, as the subject site is not located within the boundaries of a PMTSA, and is located outside of a City Community Planning Permit area, no affordable housing is required from redevelopment of the subject lands.

2.2. Provincial Planning Statement 2024

2.2.1. Planning for People and Homes

Policy 2.1.4 of the 2024 Provincial Planning Statement ("2024 PPS") requires planning authorities to provide for an appropriate range and mix of housing options to meet projected requirements of current and future residents

> *4. To provide for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area, planning authorities shall:*
>
> *a) maintain at all times the ability to accommodate residential growth for a minimum of 15 years through lands which are designated and available for residential development; and*
>
> *b) maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned, including units in draft approved or registered plans.*

Policy 2.1.5 of the 2024 PPS states that the land and unit supply maintained by the lower-tier municipality as identified in policy 2.1.4 is to be based on and reflect the allocations made by the upper-tier municipality.

Policy 2.1.6 informs how municipalities are to support the achievement of complete communities, and includes reference to the accommodation of an appropriate range and mix of land uses and housing options.

> *6. Planning authorities should support the achievement of complete communities by:*
>
> *a) accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses (including schools and associated child care facilities, longterm care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs;*
>
> *b) improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their full participation in society; and*
>
> *c) improving social equity and overall quality of life for people of all ages, abilities, and incomes, including equity-deserving groups.*

"Housing Options" is defined in the 2024 PPS as follows:

> ***Housing options:*** *means a range of housing types such as, but not limited to single-detached, semidetached, rowhouses, townhouses, stacked townhouses, multiplexes, additional residential units, tiny homes, laneway housing, garden suites, rooming houses and multi-residential buildings, including low-and mid-rise apartments. The term can also refer to a variety of housing arrangements and forms such as, but not limited to, life lease housing, co-ownership housing, co-operative housing, community land trusts, land lease community homes, affordable housing,*

additional needs housing, multigenerational housing, student housing, farm worker housing, culturally appropriate housing, supportive, community and transitional housing and housing related to employment, educational, or institutional uses, such as long-term care homes.

2.2.2. Housing

Section 2.2 of the 2024 PPS includes the following direction regarding provision of housing:

2.2 Housing

1. Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by:

a) establishing and implementing minimum targets for the provision of housing that is affordable to low and moderate income households, and coordinating land use planning and planning for housing with Service Managers to address the full range of housing options including affordable housing needs;

b) permitting and facilitating:

1. all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents, including additional needs housing and needs arising from demographic changes and employment opportunities; and

2. all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for residential use, development and introduction of new housing options within previously developed areas, and redevelopment, which results in a net increase in residential units in accordance with policy 2.3.1.3;

c) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and

d) requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations.

As the planning authority, the City is to provide an appropriate range and mix of housing options and densities to meet projected needs of both current and future residents of the regional market area by among other things, permitting and facilitating all housing options and all types of residential intensification and promoting densities which efficiently use land, resources, infrastructure and public service facilities.

2.3. Region of Halton Official Plan

As of July 2024, the Region of Halton Official Plan is no longer a Regional Plan but is now a Local Plan for the four Local Municipalities in Halton.

2.3.1. Population Forecasts

Table 1 of the Region's Official Plan allocates the City of Burlington a 2041 population of 240,500 persons, an increase of 45,500 persons over the 2021 population of 195,000 persons. The adopted Regional OP includes the Region-wide 2051 population forecasts of 1,100,000 persons with the City's portion of 2051 population being 265,160 persons, an increase of 70,160 persons from 2021.

Table 2A sets out the Regional Phasing strategy, which for the City of Burlington shows a roughly even distribution of the 20,500 intensification units the City is to accommodate over the 2022-2041 period. The forecast in Table 2A is summarized in the figure below:

Figure 4

Summary of Table 2A Regional Phasing Allocations to City of Burlington

5-Year Period	Designated Greenfield Area	DGA (low density)	DGA (med/high-density)	Built Boundary	Total
2022-2026	590	220	370	4,790	5,380
2027-2031	620	230	390	5,090	5,710
2032-2036	450	20	430	5,170	5,620
2037-2041	460	20	440	5,270	5,730
Total	2,120	490	1,630	20,320	22,440
Annual Average					
2022-2026	118	44	74	958	1,076
2027-2031	124	46	78	1,018	1,142
2032-2036	90	4	86	1,034	1,124
2037-2041	92	4	88	1,054	1,146
Total 2022-2041	106	25	82	1,016	1,122

On average, the City will need to accommodate 1,122 units each year over a 20-year period, including 106 units per year (2,120 units over the 20-year period) in the designated greenfield area. Of the 2,120 DGA units, the DGA is to add 490 net new low-density units.

The subject lands are outside of the built boundary and would therefore be part of the City's designated greenfield area (DGA).

Figure 5 – City of Burlington Urban Structure



2.3.2. Affordable Housing Policies

Policy 86(6) of the Regional OP states the following:

> *86. It is the policy of the Region to:*
>
> *(6) Adopt the following housing targets:*
>
> *b) that at least 30 per cent of new housing units produced annually in Halton be Affordable or Assisted Housing.*

Affordable Housing is defined in the Regional Official Plan as follows:

> *AFFORDABLE HOUSING means housing with a market price or rent that is affordable to households of low and moderate income spending no more than 30 percent of their gross household income.*
>
> *a) Affordable rental housing should meet the demand of households at the low end, as described in Halton's annual State of Housing Report, pursuant to Section 86(7). Such households would be able to afford at least three out of ten rental units on the market.*
>
> *b) Affordable ownership housing should meet the demand of households at the high end, as identified in Halton's annual State of Housing Report pursuant to Section 86(7). Such households would have sufficient income left, after housing expenses, to sustain the basic standard of living.*

According to the latest available version of the Region's annual State of Housing Report, the affordable price and rent thresholds in 2022 were as follows:

Figure 6

Affordable Rent	Affordable Ownership Price
$1,650 / month	$496,300

2.4. City of Burlington Official Plan

The subject lands are identified in Schedule A-1 of the Burlington Official Plan as Designated Greenfield Area.

The introduction to the Burlington OP states that "all remaining Designated Greenfield Areas will be developed as complete and sustainable communities". The Introduction section also notes that in the case of DGA, a minimum density target of 45 residents and jobs combined per hectare, as measured across all DGA lands in the City.

Policy 3.1.1.2 of the Burlington OP speaks to the City maintaining the ability to accommodate its share of growth within the regional market area.

> *3.1.1(2) POLICIES To the extent to which land is available in the Urban Area, the City shall maintain the ability to accommodate its share of residential growth within the regional market area. The City will assist the Region of Halton in the establishment and monitoring of annual minimum targets for the production of housing units by density type, and for the production of assisted and affordable housing, based on targets established in the Regional Official Plan.*

The Official Plan Amendment for development of the entirety of the subject lands sets out that a minimum of 400 affordable units will be included.

3. REVIEW OF RELEVANT DOCUMENTS

3.1. MTSA Planning Areas Market Analysis

The City retained Watson & Associates to undertake a Market Analysis of its MTSA areas ("Watson MTSA Study"), dated June 24, 2022. Figure 13 of the Watson MTSA Study shows the trends in average household sizes in the City, which have fell from 2.63 persons per unit (PPU) in 2001 to 2.56 PPU in the 2021 Census.

According to the Watson MTSA Study, the "downward trend in housing occupancy in Burlington has been driven by the aging of the population which increases the proportionate share of empty-nester and single-occupancy households". Any estimate of housing need to achieve 2031 or 2051 population forecasts needs to account for the falling population in existing units and provide additional housing units to offset the decline in average household sizes.

Figure 16 of the Watson MTSA Study shows that over the 2006-2021 period, roughly 15% of the City's housing development has been in the MTSAs, with 85% of the City's housing development activity being in "other locations", which would include the former Downtown Burlington UGC. To-date, the City's MTSAs have not been a significant source of new housing in the City.

Figure 7

Housing Development Activity by Area, City of Burlington, 2006-2021, Building Permits

MTSA	2006-2010	2011-2015	2016-2021	Total 2006-2021	% of Total 2006-2021
Downtown Burlington UGC / Burlington GO MTSA	-	175	385	560	5%
Aldershot GO MTSA	470	400	245	1,115	10%
Appleby GO MTSA	5	-	-	5	0%
Other Locations	4,570	2,335	2,845	9,750	85%
Total	5,045	2,910	3,475	11,430	100%

Source: Watson MTSA Study, Figure 16

The Watson MTSA Study estimates the existing population and jobs in each of the City's three MTSAs (as of the 2021 Census). Based on the number of existing residents and jobs in each MTSA, and the approximate planned split between residents and jobs in each MTSA as set out in Table 2B of the Halton Region Official Plan, to achieve the minimum densities in each MTSA, a total of 28,272 persons would need to be accommodated in these areas of the City.

Figure 8

Existing and Planned Density, City of Burlington MTSAs

	Downtown Burlington GO MTSA	Appleby GO	Aldershot GO	Total
Gross Hectares	102	179	86	
Planned Minimum Density (Persons & Jobs/Hectare)	200	120	150	
General Target Proportion (Table 2B ROP)				
Residents	65%	40%	80%	
Jobs	35%	60%	20%	
Needed Persons and Jobs				
Residents	13,260	8,592	10,320	32,172
Jobs	7,140	12,888	2,580	22,608
Total	20,400	21,480	12,900	54,780
Existing Persons and Jobs				
Residents	1,700	1,100	1,100	3,900
Jobs	2,700	6,400	1,100	10,200
Total	4,400	7,500	2,200	14,100
Existing Density	43	42	26	
Additional Persons and Jobs				
Residents	11,560	7,492	9,220	28,272
Jobs	4,440	6,488	1,480	12,408
Total	16,000	13,980	10,700	40,680

Source: Halton Region Official Plan Table 2B, Watson MTSA Study, Figure 31

Based on Table 1 from the approved Regional OP that included population allocations to the City of Burlington 2051, the City is projected to grow from 195,000 persons in 2021 to 265,160 persons in 2051, an increase of 70,160 persons.

The additional 28,272 persons that would need to be accommodated in the MTSAs to fully achieve the minimum density targets for each, represents 40.3% of the Region's needed population growth. The other 41,888 persons (70,160 persons less 28,272 persons) will need to be accommodated in other areas of the City.

The estimate of population growth in the MTSAs presented in the Watson MTSA Study is 30,400 persons over the 2021-2051 period. The Watson MTSA study estimates that the MTSAs will accommodate 43% of the City's population growth, and 71% of the City's employment growth. Other Burlington locations are projected by the Watson MTSA Study to accommodate 41,100 persons, or 35% more growth than the MTSAs combined.

3.2. City of Burlington Development Pipeline

The City of Burlington prepares an ongoing report to update stakeholders on the current pipeline of development, including approved developments available to apply for building permit, those pending a decision from the OLT (including those still waiting for a

hearing), those with additional planning applications to undertake despite prior approvals, and applications pending recommendation by City staff or approval via Council or other delegated authority, and those in pre-consultation stages.

In total, based on the City's July 2025 reporting, the City of Burlington's report finds that there are 44,109 dwelling units in the "housing pipeline", of which:

- 16.1% (7,119 units) are fully approved and able to apply for building permits.
- 8,087 units are waiting for site plan applications to be submitted;
- 2,469 units that are under appeal to the OLT, and
- 3,603 units are 'under review', being applications received by the City for consideration
- 23,231 units are in 'pre-application' stage, being those that are not yet under application, but the City is in consultation with developing landowners.

While 16.1% of the City's development pipeline have approvals, this means that the other 83.9%, or 36,990 units are without full planning approval, are under appeal, under review, or have not yet submitted applications for City consideration.

The City's 10-year housing target is 29,000 units, or 2,900 units per year. The 7,119 units that are fully approved with planning permissions and ready for building permit application and become a 'housing start' consistent with the metric of the housing pledges (housing starts), represents just over 2.45-years of supply that can be converted to permitted and under construction.

Assuming all 7,119 units with full planning approval are commenced in the next 10 years as proposed, to achieve the 29,000 unit target based on these 'pipeline' units becoming 'housing starts', the remaining 21,881 units needed to reach targets would require that of the 59.2% of the other 36,990 'pipeline' units without full approval would have to commence construction by 2032 to achieve the City's housing target.

Even if all of the units with partial but not full approvals are approved without any loss of unit count (8,087 units), all of the units at OLT are approved at full unit count at-issue (2,469 units), and all those awaiting decision from City Council (3,603 units) are approved at their current unit counts, this would equate to 14,159 units, which when combined with the 7,119 units with full planning approvals, results in 21,278 units with active applications in the pipeline. This would mean to achieve the 29,000-unit housing target, 100% of the units with applications/approvals would need to proceed to completion and 7,722 of the 23,231 units (or 33.2%) currently without an application

would need to be submit applications, receive approval from Council/OLT, gain all site plan approvals and gain permission to construction by 2032.

The more robust the City's development approvals pipeline is, the lower the percentage of 'pipeline' units need to clear numerous hurdles in the remaining planning, legal, design, and marketing processes, including:

- Being built with as many units as approved;
- Being approved with as many units as originally proposed and captured in the City's estimates;
- Being approved by the OLT, and being approved without reductions in unit counts;
- Being approved with sufficient units to be feasible to construct given other policy requirements, fees, charges, property taxes, financing costs; that can change and deteriorate from the time the application was made to the time the application was approved, permitted or built;
- The proportion of development units in pre-consultation stages that will result in development applications – many prospective development applications in pre-consultation stages can be aborted due to differences in perceived permissions, density allowances and appetite for continuing with prospective development application.

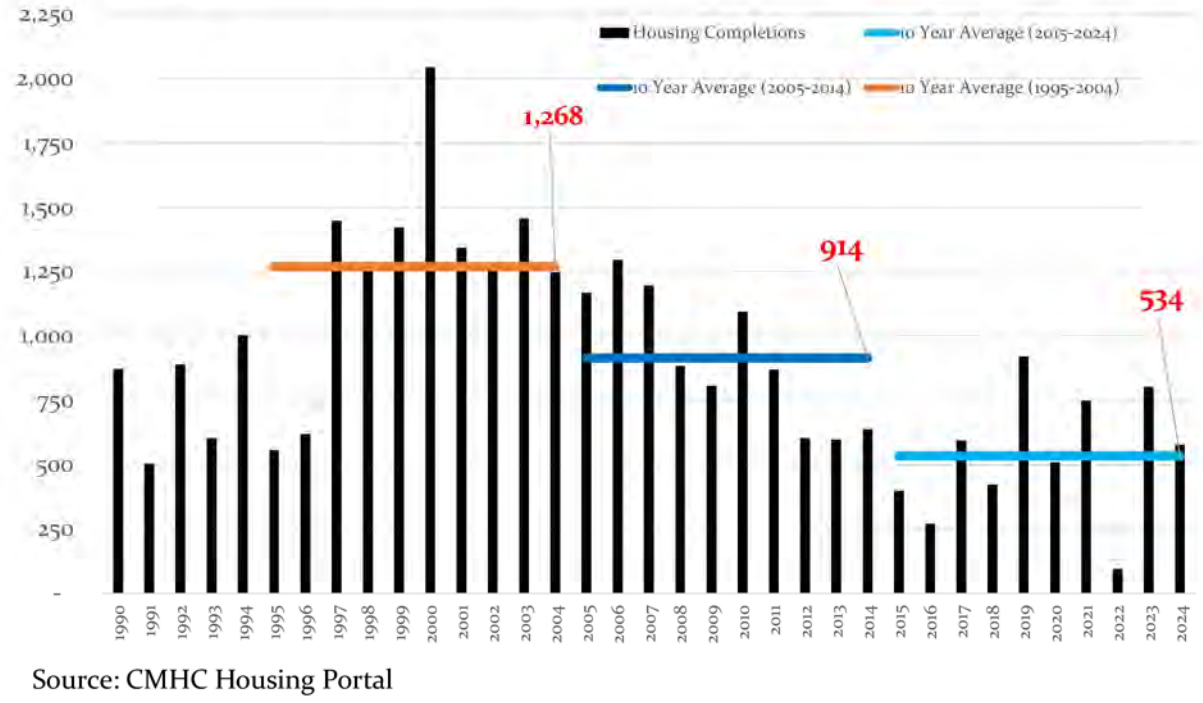
4. DATA ANALYSIS

4.1. Housing Production

4.1.1. Completions

Over the past 10 years (2015-2024), the City has seen an average of 534 units completed per year, and the 10-year averages have fallen in each successive period from 914 units per year over the 2005-2014 period and from 1,268 units per year in the 1995-2004 period. The City has not exceeded 1,000 housing completions in a single year since 2010.

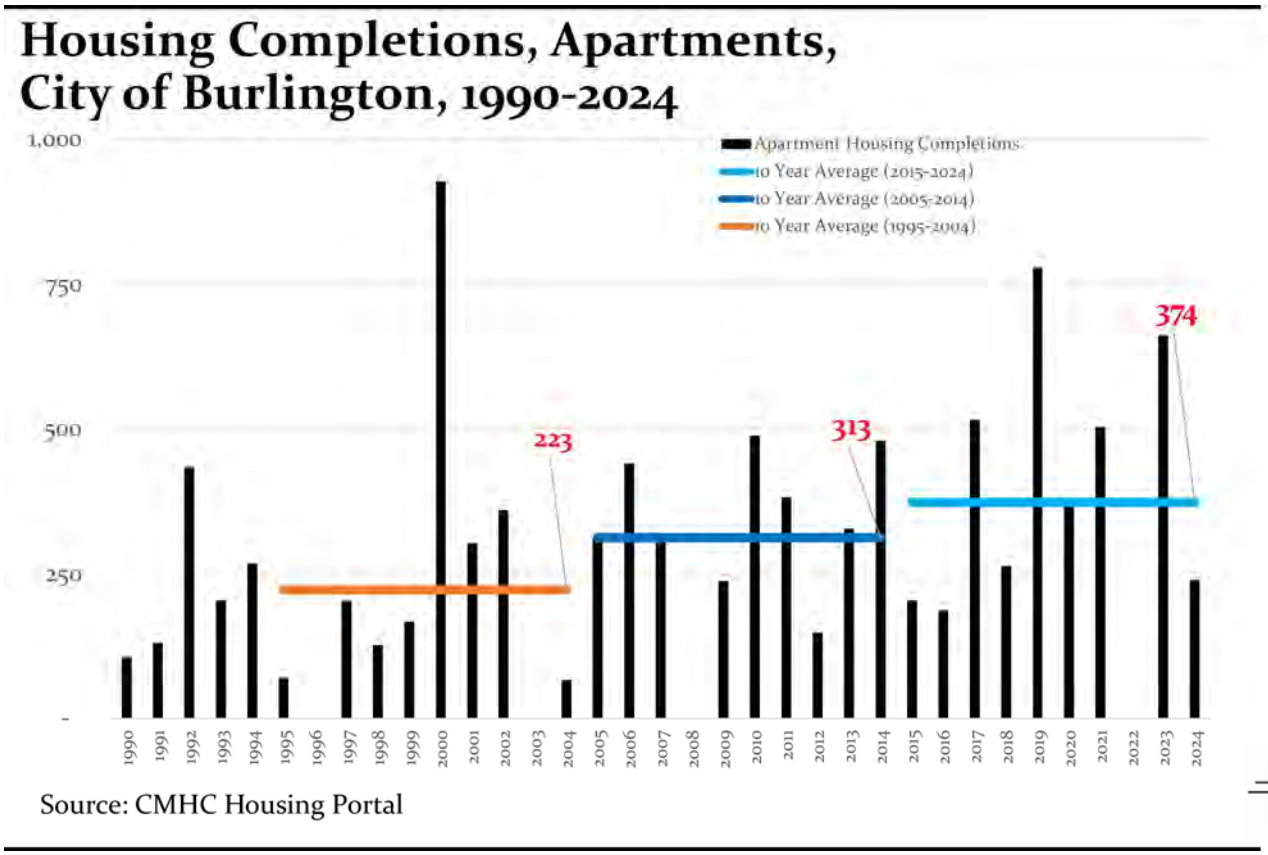
Figure 9



4.1.2. Apartment Completions

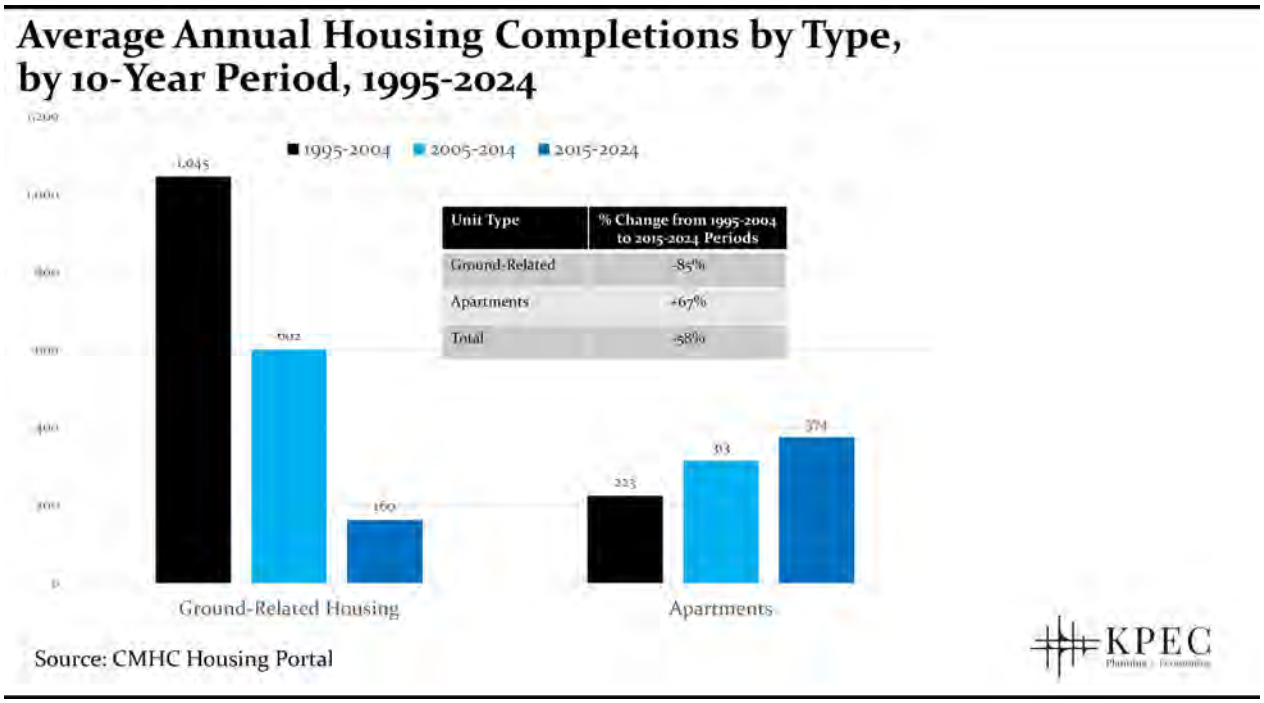
Over the past 10 years, the City has seen an increasing number of apartment completions, with the 10-year average being 374 units per year, up from the prior 10-year averages of 313 from 2005-2014 and 223 apartment units per year from 1995 to 2004.

Figure 10



The rate of new housing by type has seen ground-related housing production in the City fall by 85% from levels over the 1995-2004 period, and apartment housing production rise by 67%, however, overall housing production per year has fallen by 58%, as the increased amount of apartment units have not been enough to offset the decline and build-out of ground-related housing forms within the City's urban boundary.

Figure 11



4.1.3. Need for Accelerated Pace of Housing to Meet ROP Minimums

In addition to the 374 apartments being completed per year in the City, there have been 60 townhomes completed per year, for a total housing production of medium-and-high density units of 434 units per year. The Region Official Plan requires that 1,107 medium- and high-density units completed per year to meet the phasing set out in Table 2A.

The City will therefore need to see these unit types increase by 155% over the next 20 years than what it saw over the last 10 years from 2015 to 2024.

Figure 12

Housing Completions by Year, City of Burlington, 1990-2024

Year	Single-Detached	Semi-Detached	Row	Apartment	Total
1990	455	14	296	107	872
1991	144	4	224	132	504
1992	190	18	247	434	889
1993	246	-	151	205	602
1994	295	32	408	268	1,003
1995	194	20	270	72	556
1996	320	24	275	-	619
1997	734	68	444	204	1,450
1998	538	128	468	128	1,262
1999	564	148	545	168	1,425
2000	482	172	463	927	2,044
2001	570	36	432	303	1,341
2002	520	104	296	360	1,280
2003	642	66	750	-	1,458
2004	531	94	553	68	1,246
2005	577	12	266	311	1,166
2006	364	146	344	440	1,294
2007	411	32	440	312	1,195
2008	521	108	254	-	883
2009	284	70	214	238	806
2010	246	220	139	488	1,093
2011	287	60	140	382	869
2012	298	-	154	150	602
2013	107	2	161	328	598
2014	74	8	77	479	638
2015	113	2	78	205	398
2016	57	4	22	188	271
2017	66	-	13	515	594
2018	159	-	-	264	423
2019	62	68	11	779	920
2020	55	-	76	379	510
2021	90	50	104	503	747
2022	58	12	26	-	96
2023	95	-	44	662	801
2024	86	20	231	240	577
1990-1994	1,330	68	1,326	1,146	3,870
1995-1999	2,350	388	2,002	572	5,312
2000-2004	2,745	472	2,494	1,658	7,369
2005-2009	2,157	368	1,518	1,301	5,344
2010-2014	1,012	290	671	1,827	3,800
2015-2019	457	74	124	1,951	2,606
2020-2024	384	82	481	1,784	2,731

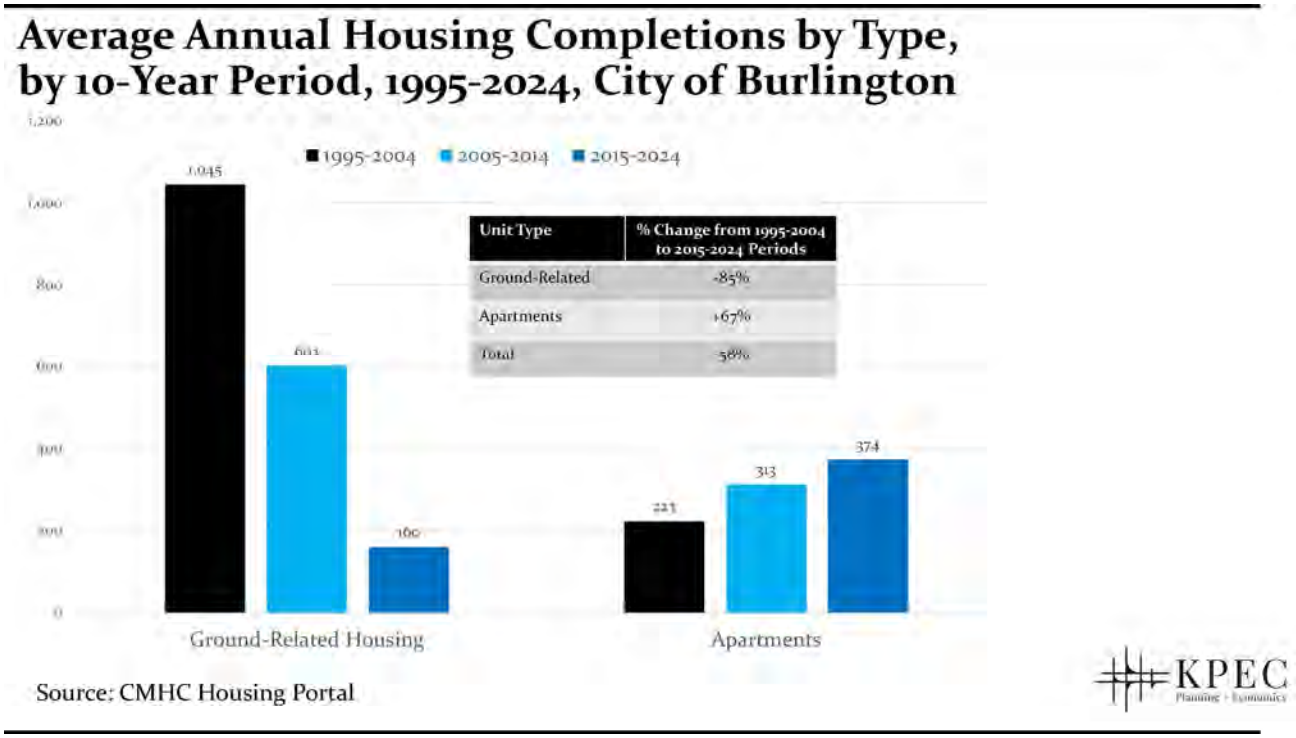
Source: CMHC

4.1.4. Need for Lower-Density Housing to Fulfill Provincial Objectives for a Range and Mix of Housing

The City has seen a substantial decline in the amount of ground-related (GR) housing constructed, from an annual average of 1,045 GR units in the 1995-2004 period, to 602 GR units in the 2005-2014 period, to only 160 GR units per year in the most recent 10-year period.

While there has been a steady increase in the amount of apartments constructed, the production of these units has not been sufficient to offset the decline in GR housing forms, such that average annual housing production in the last 10 years City-wide is 58% lower than it was in the 1995-2004 period.

Figure 13



Over time, the amount of ground-related housing forms (singles, semis, rows) has declined significantly in the City. Over the past 20 years, the age profile of the City has shifted dramatically towards older adults, with the number of persons aged 25-44 declining by 2% while the City as a whole grew by 24%. The share of persons in the City aged 25-44 has fallen from 30.2% in 2001 to 24.0% in 2021.

Figure 14

Change in Population by Age Group, City of Burlington

	2001	2021	% Change
Population	150,836	186,945	24%
Population by Age Group			
0-14 years	28,800	29,900	4%
15-24 years	17,690	20,810	18%
25-44 years	45,620	44,855	-2%
45-64 years	37,490	52,200	39%
65-85 years	19,360	33,040	71%
85+ years	1,875	6,135	227%
Median Age	38.5	44.4	
Share by Age Group			
0-14 years	19.1%	16.0%	-16%
15-24 years	11.7%	11.1%	-5%
25-44 years	30.2%	24.0%	-21%
45-64 years	24.9%	27.9%	12%
65-85 years	12.8%	17.7%	38%
85+ years	1.2%	3.3%	164%

Source: 2001 and 2021 Census of Canada

4.2. Population Growth

Over the 2001-2021 period, the City saw its population increase from 150,836 persons to 186,948 persons, which equates to annual population growth of approximately 1,800 persons per year. The five-year growth rates have slowed considerably in each subsequent five-year Census period, from growth of 13,579 persons from 2001-2006, decreasing each period to growth of just 3,634 persons from 2016-2021.

Figure 15

Change in Population and Occupied Private Dwellings, City of Burlington 2001-2021

Year	Population	Occupied Private Dwellings	Population % Change	Population Change	Population Avg. Annual Change
2001	150,836	57,340			
2006	164,415	63,159	9%	13,579	2,716
2011	175,779	68,779	7%	11,364	2,273
2016	183,314	71,373	4%	7,535	1,507
2021	186,948	73,180	2%	3,634	727
Change 2001-2021					
Total	36,112	15,840			
Avg. Annual	1,806	792			
Growth 2021-2041					
Total	45,500				
Avg. Annual	2,275				

Source: Statistics Canada Census data

To grow to 240,500 persons by 2041 (from the population of 195,000 persons in 2021 which includes Census undercount), the City will need to grow by an average of 2,275 persons per year each year for 20 years – this amount of annual population growth is:

- 213% higher than the population growth seen in the City over the 2016-2021 period;
- 104% higher than the growth seen over the 2011-2021 period;
- 26% higher than the average annual population growth seen over the past 20 years.

Given that the bulk of the population growth in the City over the past 20 years has occurred during periods (2001-2011) when its large greenfield areas were developed, and as those areas have built-out and the City has increasingly relied on higher-density forms of housing, population growth has since slowed significantly. The City will need to significantly accelerate housing growth over recent levels to fulfill the housing and population targets set out in the Halton Region Official Plan.

4.3. Nearby Developments and Development Applications

Based on current information available from the City's planning pipeline information, in the area of the City bound by QEW to the south, Walker's Line to the west, Dundas Street to the north and Burloak Drive to the east, there are 694 dwelling units under application or approved. A list of the active development applications and recent approvals not yet built is provided in the figure below.

Figure 16

Active Development Applications and Approvals, Burlington

Address	Units	Status	Unit Type
1989 Appleby Line	475	Appealed to OLT	Apartments
2155 Country Club Dr.	90	Approved	Detached
2273 Turnberry Road	67	Under Review	Townhouse
4375 Millcroft Park Dr.	30	Approved	Detached
4063 Upper Middle Road	32	Approved	Apartments
Total	694		

Totals by Unit Type	
Detached	120
Townhouse	67
Apartments	507

Source: City of Burlington

5. HOUSING ANALYSIS

5.1. Sources of Requiring or Funding Affordable Housing

5.1.1. Inclusionary Zoning

As the subject site is not located within the delineated Major Transit Station Area, or within the City's proposed CPP By-law boundaries for GO station areas, it is not subject to inclusionary zoning requirements.

5.1.2. Community Benefits Charges

Section 37 of the Planning Act allows municipalities to impose a fee of up to 4% of the land value of developments with more than 5 storeys and more than 10 residential units.

The City's 2022 Community Benefits Charges Strategy Study ("CBC Study") included plans to fund the following capital works with CBC funds generated by eligible high-density development:

- Off-street parking facilities;
- Performing Arts Centre;
- Public Art;
- EV Charging Stations;
- Information Technology;
- Studies;

Other municipalities have utilized their CBC to fund affordable housing, and the City could update its CBC strategy to allow for CBCs to be used to fund or incentivize affordable housing production.

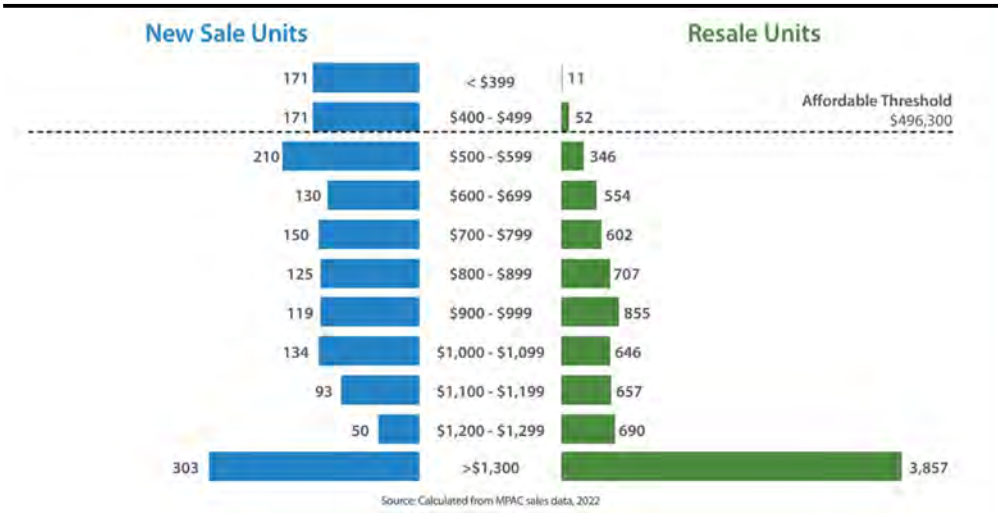
5.2. Halton Region 2023 State of Housing Report

The Region's 2023 State of Housing Report (released August 16, 2024) estimated that 932 of the 2,406 new housing unit sales (38.7%) in the Region in 2023 were under the Affordable Maximum Purchase Price of $531,900, while 269 of 7,050 resale homes (3.8%) were below the affordable price threshold. The affordability threshold used ($531,900) is what would be affordable to a household with an increase of $126,300. The rate of 38.7% of new housing units sales being deemed affordable under the City's

threshold would surpass the Region's goal to achieve 30% of new housing units produced annually to be affordable or assisted.

There were also 156 new assisted program units, up over 6-fold since 2022 (25 units). The construction of new housing is a far more productive source of affordable housing options than the current existing mix of housing in the City. Of the 333 affordable housing units, all were apartment units.

Figure 17 – Number of New Sale and Resale Units by Price Threshold, Halton Region, 2022 (Source: Halton Region 2022 State of Housing Report)



While similar municipal-level data is not reported for the 2023 State of Housing Report, based on the 2022 edition, in relation to the City of Burlington alone:

- The share of new home sales in Burlington below the affordable price threshold has increased each of the past four years from 27% in 2019 to nearly 74% in 2022.
- The City's share of new units meeting the affordable price threshold is by far the highest of any other municipality in Halton Region,

These trends and Burlington's ability provide a high rate of homes below affordability thresholds likely owes to the City of Burlington's higher-than-average share of higher-density housing forms, which are more likely to be priced at or below the prevailing price threshold.

Figure 18

Trends in New Home Sales Above/Below Affordable Price Threshold, 2019-2022

Halton Region	Below Affordable Price Threshold	Above Affordable Price Threshold	Total		% Affordable by Unit Type
Single/Semi	-	762	762		0.0%
Row	1	281	282		0.4%
Apartment	332	280	612		54.2%
Total	333	1,323	1,656		20.1%
By Municipality					
Burlington	81	29	110		73.6%
Halton Hills	-	165	165		0.0%
Milton	1	514	515		0.2%
Oakville	251	615	866		29.0%
By Year - Halton Region				Affordable Price Threshold	
2019	150	1,578	1,728	$ 393,400	8.7%
2020	585	1,762	2,347	$ 409,500	24.9%
2021	637	1,658	2,295	$ 480,700	27.8%
2022	333	1,323	1,656	$ 496,300	20.1%
By Year - Burlington					
2019	9	24	33		27.3%
2020	101	186	287		35.2%
2021	212	310	522		40.6%
2022	81	29	110		73.6%

Source: Halton Region based on annual State of Housing Reports

5.3. Provincial Affordable Housing Bulletin

Based on the Provincial bulletin for Affordable Residential Units effective July 15, 2025 (until such time a new bulletin replaces the existing one), the affordable price and rent thresholds for units in Burlington are as follows:

Figure 19

Ownership Unit Type	Price
Detached House	$484,100
Semi-Detached House	$484,100
Townhouse/Row	$484,100
Condominium Apartment	$484,100

Rental Unit Type	Rent
Bachelor Unit	$1,464
1-Bedroom	$1,733
2-Bedroom	$2,008
3-Bedroom	$2,330

5.4. Family-Sized Housing

The proposed development would include numerous housing forms that can address the need for family-sized housing in the City, including single-detached units, semi-detached units and townhouse units.

6. CONCLUSIONS AND FINDINGS

6.1. Conclusions

The conclusions and findings are expressed against the required elements of the Housing Impact Statement.

Required Element of Housing Impact Statement	Analysis
How proposal contributes to achievement of Regional housing targets	Contributing to a range and mix of new housing in the City contributes to the achievement of the City and Regional housing targets. As a parcel within one of the Region's Primary Regional Nodes and a Secondary Node in the City's OP, the development can help the Region achieve Region-wide minimum density targets in the Growth Plan and Regional OP. By utilizing and supporting existing infrastructure, the redevelopment optimizes existing infrastructure. By adding additional residential units to the City's existing pipeline, it improves the City's prospects of achieving its housing targets and exceeding its minimum planning forecasts set out in Region and City Official Plans.
How the rents or sales prices of the development are at or below the affordable housing thresholds	Based on the Region's annual housing report, a significant proportion of home sales in high-density units in Burlington meet the Provincial definition of affordable. Of Phase 1, 260 units are apartment units. The Provincial bulletin finds that the affordable price threshold in the City is $484,100.

Information Regarding Number of Affordable Housing Units to be Provided per Phase	As the subject site is not located within a Major Transit Station Area and is not part of the City's Community Planning Permit areas, the subject site is not subject to the requirement to provide affordable housing within the development.
Proposed Legal and/or Financial Mechanisms to Ensure Delivery of Any New Proposed Affordable Housing Commitments and Mechanisms to Retain Long-Term Affordability of Units	While no affordable housing is required, should any housing types be required, an appropriate legal mechanism will be made available for review. The City has the ability to utilize Community Benefits Charge (4% of land value for eligible high-density developments) reviews for a variety of purposes, which may include allocating CBC funding generated from the proposed redevelopment for affordable housing.

6.2. Findings

Beyond the specific conclusions that respond to the required elements of the Housing Impact Statement, the following presents the other high-level findings from the research and analysis into housing issues pertaining to the development proposal in the City of Burlington:

- The subject lands are not within a geographic area where affordable housing is a requirement, such as in a Protected Major Transit Station Area or a Community Planning Permit (CPP) area;
- Even if the City's three MTSAs can achieve their minimum density targets (28,272 additional persons over existing populations), a substantial amount of growth or nearly 59% of all growth will need to occur on lands outside of MTSAs to achieve the City's 2051 planning forecasts of an additional 70,160 persons. The development of Phase 1 of the subject lands can help the City achieve the City's planning forecasts.
- The City's development pipeline has approximately 44,100 housing units, however only 16% of these units have full approvals and are able to proceed to building permit stage – the other 37,000 units need some additional approval or decision. Of these, 100% of those with an application would need to be approved and 33% of those in pre-application stages (21,278 units) would need to have applications submitted, approved, and permitted to be constructed by 2031.

- Over the past 10 years, the City has seen only 374 apartment units completed per year, which when combined with 60 townhouse units per year, equates to 434 medium-and-high density units. The City will need to increase the annual production of these unit types by 155% to achieve minimum planning forecasts. The development of Phase 1 of the subject lands can help increase housing production in the City.
- The rate of new housing by type has seen ground-related housing production in the City fall by 85% from levels over the 1995-2004 period, and apartment housing production rise by 67%, however, overall housing production per year has fallen by 58%, as the increased amount of apartment units have not been enough to offset the decline and build-out of ground-related housing forms within the City's urban boundary. The development of Phase 1 of the subject lands can help increase housing production in the City.
- To grow to 240,050 persons by 2041 (from the population of 195,000 persons in 2021 which includes Census undercount), the City will need to grow by an average of 2,275 persons per year – this amount of annual population growth is 213% higher than the population growth seen in the City over the 2016-2021 period and 104% higher than the growth seen over the 2011-2021 period. The development of Phase 1 of the subject lands can help accelerate population growth in the City to reach planned growth.

Report Prepared By:



Daryl Keleher, Principal

MCIP, RPP, PLE, LAI

Keleher Planning & Economic Consulting Inc.